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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

SONOS, INC.,  
Plaintiff and Counter-defendant,  
v.  
GOOGLE LLC,  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT  
ROBERTS IN SUPPORT OF SONOS,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL RE SONOS'S  
MOTION *IN LIMINE* NO. 3**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good  
5 standing of the Bar of the State of California. I make this declaration based on my personal  
6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set  
7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under  
9 Seal in connection with Sonos’s Motion *in Limine* No. 3 (“Sonos’s Motion”) and Google’s  
10 Response to Motion *in Limine* No. 3 (“Google’s Response”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Google’s Response	Portions highlighted in blue	Sonos
Exhibit 1 to Kaplan Declaration	Portions highlighted in blue	Sonos
Exhibit 2 to Kaplan Declaration	Portions highlighted in blue	Sonos

17 4. The portions of Google’s Response highlighted in blue, and the portions of the  
18 exhibits listed above highlighted in blue, contain references to Sonos’s confidential business  
19 information and trade secrets, including technical details of the operation of Sonos’s technology,  
20 such as source code and Sonos’s research and development processes. The specifics of how this  
21 technology operates is confidential information that Sonos does not share publicly. Thus, public  
22 disclosure of such information may lead to competitive harm as Sonos’s competitors could use  
23 these details regarding the architecture and functionality of these products to gain a competitive  
24 advantage in the marketplace with respect to their competing products. A less restrictive  
25 alternative than sealing the portions of Google’s Response and the exhibits indicated in the table  
26 above, would not be sufficient because the information sought to be sealed is Sonos’s confidential  
27 business information and trade secrets and has been cited by Google.  
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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge. Executed this 25th day of April, 2023 in Belevedere, California.

3  
4 /s/ Clement S. Roberts

Clement Seth Roberts  
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